

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RONALD PURNELL,

Plaintiff,

-against-

NYC HRA P.O. NATASHA BLOUNT, Tax
Registration No. 993904, NYC HRA P.O.
WHITE, FJC SECURITY SERVICES, INC.,
JUAN HOLLY, DOMINIC GRAHAM, NYC
HRA P.O. "JOHN DOES" 1-2 and THE CITY
OF NEW YORK,

Defendants.

Case No. Civ. 1:18-cv-11758-ALC-SN

**RULE 26 (a)(1)
DISCLOSURES**

Defendant, FJC SECURITY SERVICES, INC. ("FJC"), by its undersigned attorneys,
Lewis Johs Avallone Aviles LLP, hereby provide its Initial Disclosures pursuant to Rule 26(a)(1)
of the Federal Rules of Civil Procedure, as follows:

A. *The name and, if known, the address and telephone number of each individual likely
to have discoverable information that the disclosing party may use to support its claims or
defenses, unless solely for impeachment, identifying the subjects of the information:*

The parties to this action; FJC employees, Dominic Graham and Juan Helly. Any FJC employees
may only be contacted through the undersigned counsel. FJC reserves the right to supplement this
response.

B. *A copy of, or a description by category and location of, all documents, data
compilations, and tangible things that are in the possession, custody, or control of the party and
that the disclosing party may use to support its claims or defenses, unless solely for impeachment:*

Documentation will be provided under separate cover.

C. *Computation of damages:*

Not applicable.

D. *The contents of any insurance agreement:*

FJC SECURITY SERVICES, INC. was covered by a policy of insurance issued by Evanston Insurance Company providing for liability coverage in the amount of \$1,000,000.00 per occurrence under policy number 3C41888.

Defendant, FJC SECURITY SERVICES, INC. reserves its right to amend and/or supplement this disclosure up to and including the time of trial.

Dated: Islandia, New York
January 13, 2020

LEWIS JOHS AVALLONE AVILES, LLP

By: 
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***Attorneys for Defendants-FJC Security Services,
Inc., Juan Helly i/s/h/a Juan Holly and Dominic
Graham***

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